

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

In Re: Case No. 3:18-BK-00800-JAF
GEA SEASIDE INVESTMENT INC., Chapter 11
Debtor.
_____ /

REQUEST FOR SPECIAL NOTICE AND SERVICE OF COPIES

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL INTERESTED PARTIES

PLEASE TAKE NOTICE that ALDRIDGE PITE, LLP submits this Request for Special Notice and Service of Copies, for Fay Servicing, LLC and hereby requests special notice of all events relevant to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors committees and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

ALDRIDGE PITE, LLP, requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:

Wanda D. Murray
ALDRIDGE PITE, LLP
Aldridge Pite, LLP
Fifteen Piedmont Center
3575 Piedmont Road, N.E., Suite 500
Atlanta, GA 30305

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's:

- a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;
- b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant proceeding by Fed. R. Bankr. P. 7004. This Request for Special Notice shall not operate as a confession and/or concession of jurisdiction. Moreover, the within party does not authorize Aldridge Pite, LLP, either expressly or impliedly through Aldridge Pite, LLP's participation in the instant proceeding, to act as its agent for purposes of service under Fed. R. Bankr. P. 7004;
- c. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;
- d. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

Dated: December 28, 2021

ALDRIDGE PITE, LLP

/s/ Wanda D. Murray

Wanda D. Murray (SBN 566381)

WMurray@aldridgepite.com

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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing REQUEST FOR SERVICE OF COPIES to be served on December 28, 2021. Service was accomplished by the method and to the following as indicated:

BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

GEA Seaside Investment Inc.
428 North Peninsula Drive
Daytona Beach, FL 32118

Taylor J King
Law Offices of Mickler & Mickler
5452 Arlington Expressway
Jacksonville, FL 32211
tjking@planlaw.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 28, 2021

/s/ Karla Reyez
KARLA REYEZ